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*Attorneys for Defendant: Otto Trucking LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF JAMES LIN IN  
SUPPORT OF DEFENDANT OTTO  
TRUCKING'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF ITS MOTION FOR  
RELIEF FROM NON-DISPOSITIVE  
PRETRIAL ORDERS**

Courtroom: 8-19<sup>th</sup> Floor  
Judge: Hon. William H. Alsup  
Trial: October 10, 2017

Filed/Lodged Concurrently with:

1. Admin. Mtn. to File Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

I, James Lin, declare as follows:

1. I am an attorney at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Portions of its Motion for Relief from Non-Dispositive Pretrial Orders (the “Administrative Motion”).

2. I have reviewed the following documents and confirmed that only the portions identified below merit provisional sealing:

Document	Portions to Be Filed Under Seal
Otto Trucking’s Letter Brief re Motion for Relief from Non-Dispositive Pretrial Orders	Highlighted Portions
Exhibit 3 to Boock Declaration – Document Bates-stamped WAYMO-UBER-00086885	Entire Document
Exhibit 4 to Boock Declaration – Document Bates-stamped WAYMO-UBER-00084492	Entire Document
Exhibit 5 to Boock Declaration – Document Bates-stamped WAYMO-UBER-00086932	Entire Document
Exhibit 6 to Boock Declaration – Document Bates-stamped WAYMO-UBER-00086812	Entire Document
Exhibit 10 to Boock Declaration – Document Bates-stamped WAYMO-UBER-00086809	Entire Document

3. The highlighted portions of the Letter Brief and the entirety of Exhibits 3, 4, 5, 6, and 10 to the Boock Declaration contain information that Waymo has designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate.



**PROOF OF SERVICE**

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **September 11, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **September 11, 2017**.

/s/ James Lin  
JAMES LIN